



M O S K O W I T Z & B O O K , L L P

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By ECF

Hon. P. Kevin Castel
U.S. District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Geovanny Fuentes Ramirez
15 Cr. 379 (PKC)

Dear Judge Castel:

This letter is respectfully submitted on behalf of the defendant Geovanny Fuentes Ramirez to request an adjournment of the sentencing currently scheduled to take place before Your Honor on June 24, 2021. The adjournment is necessary to enable counsel to obtain letters of support and other information relevant to sentencing and to provide counsel with sufficient time to prepare a sentencing submission on behalf of Mr. Fuentes Ramirez.

Counsel received the draft of the presentence investigation report on May 24 and because of the difficulty of scheduling a visit with Mr. Fuentes Ramirez and an interpreter at the MCC, was not able to review the report with him until June 8. We have been in touch with Mr. Fuentes Ramirez's family to request letters of support on his behalf, but those letters have not yet arrived. Given the language and cultural barriers, we anticipate that we will need at least another two months to obtain the letters and other information we need and to prepare a sentencing submission. Accordingly, we are requesting that the Court adjourn the sentencing to a date in the last week of August convenient to the Court and the parties. Alternatively, the parties are available the afternoons of September 9 or 10.

I have discussed this matter with counsel for the Government who advised me that the Government has no objection to the requested adjournment.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Avraham C. Moskowitz'.

Avraham C. Moskowitz

cc: AUSA Guttwillig and Lockard (by email)